

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 1:13CV2
	)	
ELONDA S. WOMBLE,	)	
	)	
Defendant.	)	<u>COMPLAINT</u>

The United States of America, by Ripley Rand, United States Attorney for the Middle District of North Carolina, brings this action, complaining and alleging as follows:

1. This is a civil action brought by said Plaintiff and the court has jurisdiction over this action by virtue of 28 U.S.C. §1345.
2. That the Defendant, Elonda S. Womble, resides in Sanford, North Carolina, within the jurisdiction of this court.
3. On or about August 30, 2005, the Defendant executed a contract a copy of which is hereto annexed as Exhibit "A". The Defendant has defaulted in the payments due under said contract and owes the Plaintiff the amount of \$97,587.99, which includes principal in the amount of \$57,774.50, interest computed as of November 26, 2012, in the amount of \$34,219.70, and administrative charges in the amount of \$5,593.79, and additional interest at the rate of 12.125 percent per annum from November 27, 2012, until judgment; and the amount of \$43,004.17, which includes principal in the amount of \$33,153.50, and interest in the amount of \$9,850.67, and additional interest at the rate of

11.25 percent per annum from November 27, 2012, until judgment; together with postjudgment interest as allowed by law and costs, as is more fully shown on the Certificate of Indebtedness attached hereto as Exhibit "B".

4. That the Plaintiff has made demand upon the Defendant for payment of the aforesaid indebtedness, but the Defendant has failed, neglected and refused to satisfy said indebtedness.

5. To declarant's best information and belief the Defendant is not an infant or incompetent person and is not in the military service within purview of the Soldiers' and Sailors' Civil Relief Act of 1940, as amended.

6. Plaintiff has contacted the Defense Manpower Data Center and they do not possess any information indicating the Defendant's status as active.

WHEREFORE, Plaintiff prays for judgment against the Defendant for the amount of which includes principal in the amount of \$57,774.50, interest computed as of November 26, 2012, in the amount of \$34,219.70, and administrative charges in the amount of \$5,593.79, and additional interest at the rate of 12.125 percent per annum from November 27, 2012, until judgment; and the amount of \$43,004.17, which includes principal in the amount of \$33,153.50, and interest in the amount of \$9,850.67, and additional interest at the rate of 11.25 percent per annum from November 27, 2012, until judgment; together with postjudgment interest as allowed by law and costs, and for such other and further relief as the court may deem just, fair and reasonable.

RIPLEY RAND  
United States Attorney

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/s/ Joan B. Binkley  
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